

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>In re: Geneva C. Bussey Debtor</p> <p>PennyMac Loan Services, LLC, or its Successor or Assignee Movant</p> <p style="text-align: center;">vs.</p> <p>William C. Milller, Trustee Geneva C. Bussey Respondents</p>	<p>Chapter 13 Bankruptcy No. 20-14350-amc</p>
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**MOTION OF PENNYMAC LOAN SERVICES, LLC, OR ITS SUCCESSOR OR ASSIGNEE FOR
RELIEF FROM AUTOMATIC STAY UNDER ' 362(a)**

Movant: PennyMac Loan Services, LLC, or its Successor or Assignee

Mortgage dated March 15, 2018 and recorded on March 26, 2018 in the Office of the Recorder of Delaware County in Mortgage Book 06144 Page 0323.

Assignment of Mortgage dated August 10, 2018 and recorded on September 13, 2018 in the Office of the Recorder of Delaware County in Mortgage Book 06224 Page 0144.

1. PennyMac Loan Services, LLC, or its Successor or Assignee (hereinafter "Movant") holds a claim secured by a duly recorded Mortgage on property of Geneva C. Bussey, or of the bankruptcy estate located at: 224 Pusey Ave, Collingdale, Pennsylvania 19023.

2. Geneva C. Bussey (hereinafter "Debtor") filed a Petition under Chapter 13 on November 3, 2020.

3. At the present time, the Mortgage requires payments each month of \$1,127.83.

4. Movant has not received regular mortgage payments and lacks adequate protection of its interests.

5. Debtor is in default of post-petition payments to the present date from December 1, 2020.

6. The total amount of the post-petition arrearage as of this date is \$3,383.49. This figure is broken down as follows:

-Three (3) delinquent payments, each in the amount of \$1,127.83, representing the months of December 2020 through February 2021

7. Since February 17, 2021, Movant has incurred attorneys' fees in connection with this Motion.

8. Movant does not have and has not been offered adequate protection for its interest in said premises and may be required to pay expenses for said premises in order to preserve its lien, which is the obligation of the Debtor under said Mortgage.

9. Movant specifically requests permission from the Honorable Court to communicate with the Debtor and Debtor's counsel to the extent necessary to comply with applicable nonbankruptcy law.

WHEREFORE, Movant prays for an order modifying the automatic stay of Bankruptcy Code ' 362(a) to permit Movant to foreclose its Mortgage and to exercise any other rights it has under the Mortgage or with

respect to the mortgaged property such actions may include but are not limited to selling the property at Sheriff Sale, entering into a loan modification or signing a deed in lieu of foreclosure; and

Further, granting Movant permission from this Honorable Court to communicate with the Debtor and Debtor's counsel to the extent necessary to comply with the applicable nonbankruptcy law.

/s/ Lauren M. Moyer, Esquire

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